

'O:Honorable Alvin K. Hellerstein COMPANY:

WILLIAM L. JUSKA, JR.  
 JAMES L. ROSS\*  
 ERIC E. LENOK  
 JOHN J. WALSH\*  
 PATRICK J. BONNER\*  
 PETER J. GUTOWSKI  
 MARK F. MULLER  
 WAYNE D. MEEHAN\*  
 DON P. MURNANE, JR.\*  
 THOMAS M. RUSSO  
 THOMAS M. CANEVARI\*  
 MICHAEL FERNANDEZ\*  
 JOHN F. KARPOUSIS\*  
 MICHAEL E. UNGER\*  
 WILLIAM J. PALLAS\*  
 GINA M. VENEZIA\*  
 JUSTIN T. NASTRO\*  
 MANUEL A. MOLINA  
 DANIEL J. FITZGERALD\*  
 BARBARA G. CARNEVALE  
 JAN P. GISHOLT\*  
 SUSAN LEE\*  
 ERIC J. MATHESON\*  
 MICHAEL D. TUCKER\*

LAW OFFICES OF  
**FREEHILL HOGAN & MAHAR LLP**

80 PINE STREET  
 NEW YORK, N.Y. 10005-1759

TELEPHONE (212) 425-1900

FACSIMILE (212) 425-1901

E-MAIL: [reception@freehill.com](mailto:reception@freehill.com)[www.freehill.com](http://www.freehill.com)

NEW JERSEY OFFICE  
 549 SUMMIT AVENUE  
 JERSEY CITY, N.J. 07306-2701  
 TELEPHONE (973) 623-5514  
 FACSIMILE (973) 623-3813

CONNECTICUT OFFICE  
 246 MARGHERITA LAWN  
 STRATFORD, CT 06615  
 TELEPHONE: (203) 921-1913  
 FACSIMILE (203) 358-8377

USDC SENY  
 DOCUMENT  
 ELECTRONICALLY FILED  
 OF COUNSEL  
 DOC #: 8/14/14  
 DATE FILED: 8/14/14

\* ALSO ADMITTED IN NEW JERSEY  
 T ALSO ADMITTED IN CONNECTICUT  
 ▲ ALSO ADMITTED IN WASHINGTON, D.C.  
 ▲ ALSO ADMITTED IN LOUISIANA

RECEIVED  
 AUG 13 2014  
 CHAMBERS OF  
 ALVIN K. HELLERSTEIN  
 U.S.D.J.

August 13, 2014

Our ref: 592-08/WDM/GMV

*One last adjournment  
 is granted, to Sep 19,  
 2014, 10<sup>00</sup> a.m.  
 8-13-14*



Dear Judge Hellerstein:

We represent the vessel owner and vessel manager ("Owners/Managers") in the captioned litigation, and also serve as Liaison Counsel for the Defending Parties. We are writing to provide the Court with an update on the settlement.

We had previously advised the Court that we circulated a draft settlement agreement and solicited comments and suggested changes from the various parties to the agreement. We have now worked through the parties' comments/concerns about the terms of the agreement, and we have today circulated what we anticipate to be the final draft. Once the agreement has been signed by all parties, we intend to submit a stipulation discontinuing the consolidated actions.

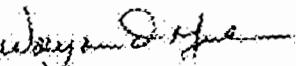
'O:Honorable Alvin K. Hellerstein COMPANY:

August 13, 2014  
Page 2 of 3

Under the circumstances, we respectfully request that the conference scheduled for this Friday, August 15, 2014, be adjourned, pending the filing of the Stipulation of Discontinuance.

We thank the Court for its consideration.

Respectfully submitted,  
FREEHILL HOGAN & MAHAR, LLP

  
Wayne D. Meehan  
Gina M. Venezia

WDM/mc

cc: All counsel via email

Counsel for Plaintiff Cargo Interests:

mcginnis@midwestllc.com; bradley@midwestllc.com; scott@midwestllc.com;  
mf@caseybarrett.com; ms@caseybarrett.com  
lwmcney@niccettithornis.com; scphuzzi@midwestllc.com;  
pschlier@midwestllc.com  
jkrauzis@midwestllc.com  
amalsich@cozen.com; dkoh@cozen.com;

Counsel for NVO's:

stheison@naviweb.com  
kgutsc@aol.com  
jba@bar.net

Counsel for Vessel Owners:

mvenezia@freehill.com; meehan@freehill.com

Counsel for APL:

jkimbali@blankrome.com; LWilegen@BlankRome.com; AWeigel@BlankRome.com

Counsel for MOL:

jmccone@mcraughinstem.com

Counsel for Hyundai:

ldonatelli@cksl.com; avengrove@cksl.com

'O:Honorable Alvin K. Hellerstein COMPANY:

August 13, 2014  
Page 3 of 3

Counsel for Spectrum:

[JSavill@hill rivkins.com](mailto:JSavill@hill rivkins.com); [RHayden@hill rivkins.com](mailto:RHayden@hill rivkins.com); [beisenhower@hill rivkins.com](mailto:beisenhower@hill rivkins.com)

Counsel for BYD:

[lydia@cardillecorbett.com](mailto:lydia@cardillecorbett.com)

Counsel for Quantum:

[pil@imcplaw.com](mailto:pil@imcplaw.com); [sem@imcplaw.com](mailto:sem@imcplaw.com)

Counsel for GPI:

[timweser@hillbetts.com](mailto:timweser@hillbetts.com); [bfarrell@hillbetts.com](mailto:bfarrell@hillbetts.com)

Counsel for Desay:

[Lawrence.Brennan@wilsonelaw.com](mailto:Lawrence.Brennan@wilsonelaw.com)

421486.1

FREEHILL, HOGAN & MAHAR LLP